image data transferred from a memory-incorporating apparatus. To this end, the Office Action relies upon the Abdel-Mottalab patent as allegedly teaching the feature that is acknowledged to be missing from the Takahashi patent. Without acquiescing to the Office Action's characterization of the Takahashi patent, relative to the subject matter of the rejected claims, Applicants respectfully submit that the Abdel-Mottalab patent does not teach the claimed subject matter for which it is being relied upon. Consequently, any reasonable combination of the teachings of these two references does not lead a person of ordinary skill in the art to the claimed subject matter.

More particularly, claim 1 recites, among other elements, "a display portion for displaying a third key to accept a reread instruction…" The claim recites that "the display portion displays the third key…" and that "when the third key is pressed," image data is transferred from a memory-incorporating apparatus and an image is formed by the printing device. Thus, in the context of claim 1, the third key constitutes an element of the user interface that is displayed to the user, so that the user can then press the key to input a reread instruction.

In the Abdel-Mottalab patent, the term "key" has an entirely different meaning. It is not an element of a user interface that is displayed and is capable of being pressed by a user. Rather, the "index keys" described in the reference are quantitative descriptors of images. Their purpose is to enable an image retrieval system to determine the degree of similarity between two stored images.

Referring to column 4 of the Abdel-Mottalab patent, the "Description of the Preferred Embodiments" begins by stating that the disclosed invention has two main aspects, namely (1) index key extraction and archival, and (2) retrieval of still images using index keys. The patent goes on to state that index key extraction and archival

"refers to extracting index keys of still images and storing the extracted index keys of the still images in a database", whereas retrieval refers to "extracting the index key from a query image (...designated by the user...), then comparing that query image index key against the index keys representing the images being searched..." Thus, in the context of the patent, index keys comprise information that is "extracted" from an image, and subsequently used to compare different images with one another. In the paragraph beginning at col. 5, line 17, the patent generally describes how an index key is extracted:

> To extract the index key, DC components of the DCT coefficients may be determined and compared for each selected window pair within the image...components of the DCT coefficients other than the DC components may be used to extract the image keys.

See also col. 8, lines 41-45. A more detailed discussion of the formation of the index keys begins at col. 9, line 64.

In essence, therefore, an "index key", as described in the Abdel-Mottalab patent, comprises a numerical value that represents the contents of an image. These numerical values for different images can then be compared with one another, to obtain a measure of the similarity of two images to one another. See, in particular, col. 6, lines 10-19.

It is respectfully submitted that the index keys disclosed in the Abdel-Mottalab patent do not possess any of the characteristics of the third key recited in the rejected claims. They do not constitute elements of a user interface. In particular, they are not displayed to a user. In the context of the Abdel-Mottalab patent, there is no reason to display the index keys to the user. First, they are likely to be incomprehensible to a user, since they are lengthy numerical values, e.g. up to 128

bytes in length (col. 8, lines 62-64). Second, their purpose is to be used internally by the image retrieval system, to determine the degree to which two different images match one another. Displaying them would serve no purpose in this function.

Moreover, there is no disclosure in the Abdel-Mottalab patent that the index keys are capable of being pressed, as also recited in the rejected claims. In the image retrieval system of the reference, the only inputs provided by the user are the selection of the initial query image, i.e., the image that is used as the basis for the search (Figure 2, step 200), and the selection of the set of images to be searched (Figure 2, step 204). Thus, the user input is directed to the selection of images. There is nothing in the Abdel-Mottalab patent to suggest that the index keys are either displayed to the user, or pressed by the user to enter an instruction.

In summary, therefore, it is respectfully submitted that an index key, as described in the Abdel-Mottalab patent, is an entirely different mechanism from the third key recited in the rejected claims. It is not an element of a user interface that is displayed to a user, nor is it employed by a user to enter any form of instruction, let alone a reread instruction that causes data to be transferred from a memory-incorporating apparatus, so that an image can be printed therefrom. As noted previously, it is a quantitative, e.g. numerical, descriptor of an image that is used for comparative calculations.

For at least these reasons, therefore, it is respectfully submitted that the Abdel-Mottalab patent does not disclose the subject matter that is acknowledged in the Office Action as being missing from the Takahashi patent. Consequently, any reasonable application of the teachings of the Abdel-Mottalab patent to the file system of the Takahashi patent would not result in the combination of features

recited in the rejected claims. Reconsideration and withdrawal of the rejection based upon the Takahashi and Abdel-Mottalab patents is respectfully requested.

It is respectfully submitted that the tertiary references, namely the Nishiyama and Anai patents, do not overcome the lack of teaching in the Abdel-Mottalab patent with respect to the claimed third key. Accordingly, the rejections of claims 4, 12 and 21-26, which are based upon these additional references, should also be withdrawn.

In view of the foregoing, it is respectfully submitted that all pending claims are patentably distinct from the references of record, even when they are considered in combination with one another. Allowance of all pending claims is therefore respectfully requested.

Respectfully submitted,

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